

Exhibit F

Letter by Counsel

Jonathan O'Brien, Esq.
43 W. 43rd Street, Suite 002
New York, NY, 10036
jobrien@burnsobrienlaw.com

November 16, 2020

Kimberly Wall, Superintendent
Democracy Prep Public Schools
Democracy Prep at the Agassi Campus
1201 W. Lake Mead Blvd.
Las Vegas, NV 89106

Re: Your Mandatory “Critical Race Theory” Class, “The Sociology of Change”

To Whom It May Concern:

I am an attorney and representative of the Clark Family. William Clark is a student at your DPAC public school and Gabrielle Clark is his mother. As you may be aware, William and his mother Gabrielle objected on conscience to the content and programming of your “Sociology of Change” class on multiple occasions beginning earlier this semester. In meetings with DPAC senior officials and in writing beginning this September, the Clarks repeatedly objected to the discriminatory content of the “Sociology of Change” class that served no apparent pedagogical purpose beyond ideological thought reform. Here is but one example of many from the DPAC “Sociology of Change” class materials:



As you also may know, the Clarks are a biracial family. William’s father, now deceased, is white. Gabrielle also has a white parent. As such they object to the glib racism of your course materials and programming, which includes statements in no apparent context like “Racism is what white people do to people of color,” repeated ad infinitum. This and statements like it are patently racist, create a hostile and divisive educational environment, and violate Title VI of the Civil Rights Act, a law which you must follow because you receive state and federal funds, and also because you are contractually obligated to follow it in your agreement with the Nevada State Public Charter Authority.¹

Mandatory participation in your “Sociology of Change” class requires reciting and affirming a predetermined and politically loaded worldview which William and Gabrielle cannot in good conscience abide. Upon information and belief, the teacher who taught this class explicitly discouraged disagreement, terminating class discussion when students objected to the content of the class materials. William and his mother object to his teacher repeatedly directing students in the “Sociology of Change” class to publicly profess their sexual, racial, and religious identities so that the teacher and others can scrutinize,

¹ <http://charterschools.nv.gov/uploadedFiles/CharterSchoolsnvgov/content/News/2020/200626-Democracy-Prep-at-Agassi-Contract-draft-5-21-20-clean.pdf>

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interrogate and label those identities in a derogatory manner. This psychologically abusive exercise is an offensive violation of privacy and amounts to compelled speech. These exercises serve no apparent pedagogical purpose and yet are pervasive to the class and homework assignments. It is troubling that DPAC Principal Adam Johnson claimed in writing that he reviewed these course materials and found nothing wrong with them, and then threatened William with non-graduation and grade penalization if he did not return to the class and participate fully. [See attached Letter] It is doubly troubling that various senior DPAC and DPPS school officials were party to these threats on multiple occasions, and did nothing while all knew that college application season is imminent for William.

You violated William and his mother's Constitutional Rights, and rather than seeking speedy accommodation when they objected, you doubled down and retaliated against them on multiple occasions. There is good reason to believe that a court would agree, since attendance is required at these ideologically loaded classes and the purported goal of the "Sociology of Change" class is to change students' fundamental personal convictions. Your behavior implicates the First, Fifth, and Fourteenth Amendments, as well as a host of Civil Rights laws including Title VI and Title IX. Indeed, regarding public schools, the United States Supreme Court has repeatedly affirmed that "[i]f there is any fixed star in our constitutional constellation, it is that no official, high or petty, can prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion or force citizens to confess by word or act their faith therein." *Texas v. Johnson*, 491 U.S. 397, 415 (1989) (quoting *W. Va. Bd. of Educ. v. Barnette*, 319 U.S. 624, 642 (1943)).

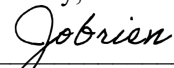
In any case, William, his mother Gabrielle and representatives of the Clark family would like one last occasion to meet with you in the next week, and no later. College application season is looming, and we would like to seek a path forward that not only safeguards William's academic future, but also preserves the integrity of his conscience, shields him from further discrimination and harassment, and honors his mother Gabrielle's right to guide and direct the upbringing of her son without undue coercion from public school officials.

To that end, we also ask that you give a good faith, written assurance that you will refrain from hosting, promoting, and compelling participation in a discriminatory curriculum that operates unbeknownst to parents, and perhaps to your regulators, under the guise of "Civic Engagement," "Social Justice" and the "Sociology of Change."

Please reach out to me at your earliest convenience.

Thank you and we look forward to hearing from you.

Sincerely,



Jonathan O'Brien, Esq.
The Law Office of Jonathan O'Brien
43 W. 43rd Street, Suite 002
NY, NY 10036
T: 6103682988
jobrien@burnsobrienlaw.com

Done

Sociology of Change Response Letter.pdf



DEMOCRACY PREP

AT THE AGASSI CAMPUS

Work Hard. Go to College. Change the World!

September 18, 2020

Dear Ms. Clark,

Thank you for engaging with me during our conversation on Tuesday. Per our conversation, I am writing to provide a formal decision to your request to have William removed from the Sociology of Change course.

After reviewing all of the documents from Ms. Bass, the course syllabus, and hearing your concerns, I have determined that the Sociology of Change Course is still a valuable learning experience for William (and his classmates) and will continue to be a required course for his graduation from DPAC.

As noted in my follow-up to William, DPAC must be a safe, inclusive, and respectful environment for all scholars. We welcome civil academic and social discourse. Moreover, our scholars' ability to understand others' point of view and evolve their thinking is a critical skill to develop, and we hope that by scholars in the Sociology of Change course continuing to engage with one another on a variety of topics where scholars may have varying opinions, our scholars will be able to better engage in this discourse as they build coalitions in their communities.

At Democracy Prep our mission is to educate responsible citizen scholars for success in the college of their choice and a life of active citizenship. In short, we expect scholars to "Work Hard. Go to College. [And] Change the World!" In order to prepare scholars for those tasks, we need to provide experiences on campus that allow scholars to practice the necessary skills to achieve that lofty goal. The Change the World project is an opportunity for our seniors to demonstrate their mastery of the required skills of problem identification, solution design, coalition building, and project execution. The Sociology of Change course is intrinsic to their success in completing the project. In the class they are exposed to social change and social movement theory. Their analysis of social change movements and theory is integral to their growth and execution of their projects.

I continue to stand behind the Change the World Project and the associated Sociology of Change course. If you have questions about my decisions or want to further discuss how we can ensure we provide a safe and welcoming environment for William and his classmates, please do not hesitate to contact me.

Thank you,

Adam Johnson
Executive Director
Democracy Prep at the Agassi Campus